

ATTACHMENT A: STIPULATED FACTS

United States v. Carlson Cho

The parties hereby stipulate and agree that if this case proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. They agree that these are not all of the facts that would be proved if this case proceeded to trial.

At all relevant times, the Defendant, **CARLSON CHO**, a/k/a “Uncle Tiga2,” a/k/a “**Carlson Banker**” (“**CHO**”), was a resident of Massachusetts. **Aldrin Fon Fomukong** (“**Fomukong**”) was a resident of Greenbelt, Maryland.

“Drop Accounts” were bank accounts opened or controlled by **CHO** and his co-conspirators that were used to receive money from victims. On or about February 21, 2017, Individual 2 opened Bank of America account x9655 (“**BOA x9655**”) in the name of Chavez Investment Inc. On or about April 1, 2017, Individual 8 opened Bank of America account x8581 (“**BOA x8581**”) in the name of Minnever S/A. On or about June 7, 2017, Individual 3 opened Bank of America account x7760 (“**BOA x7760**”) in the name of Individual 3.

Victim C and Victim D were residents of Nevada. Victim L was a resident of California. Victim M was a business located in Colorado.

Between in or about March 2017 and in or about June 2017, in the District of Maryland and elsewhere, **CHO** did knowingly combine, conspire, and agree with **Fomukong**, and others persons, to conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity—to wit, conspiracy to commit wire fraud in violation of 18 U.S.C. § 1349—while knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity and (a) with the intent to promote the carrying on of specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and (b) knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

It was part of the conspiracy and scheme to defraud that **CHO** and his co-conspirators opened and/or managed the Drop Accounts in order to receive millions of dollars into those accounts from the Victims. It was further part of the conspiracy and scheme to defraud that **CHO** and his co-conspirators caused the Victims to use the wires to transfer money to the Drop Accounts. It was further part of the conspiracy and scheme to defraud that **CHO** and his co-conspirators disbursed the money received from the Victims into the Drop Accounts by using wires to transfer money to other accounts, by initiating account transfers to other accounts at the same bank, by withdrawing sums of money, by obtaining cashier’s checks, and by writing checks to other individuals or entities, all to promote wire fraud conspiracy and other criminal conduct, and to hide true ownership and disguise the nature, source, and control of those assets.

In furtherance of the conspiracy, and to effect the objects thereof, **CHO** committed and caused to be committed the following acts, among others, in the District of Maryland and elsewhere.

On or about March 9, 2017, after receiving two separate wire transfers in the amount of \$875,000 and \$123,620.55 from Victim C and Victim D, respectively, Individual 2, at the direction of **Fomukong** and with the assistance of **CHO** (who was an employee of Bank of America at the time) caused a wire transfer in the amount of \$393,750 to be sent to a bank account located in Cameroon in the name of Individual 4, and a separate wire transfer in the amount of \$350,000 to be sent to a bank account located in South Africa in the name of Business 2.

On or about April 19, 2017, and April 20, 2017, after receiving a \$2,085,050 wire transfer from Victim M into BOA x8581, **CHO** (using his position as a Bank of America employee) initiated the following wire transactions: (1) a \$250,000 wire to a bank account in the Czech Republic; (2) a \$500,000 wire to a bank account in South Africa; (3) a \$574,955 wire to a bank account in Poland; and (4) a \$760,000 wire to a second bank account in Poland.

On or about June 15, 2017, after receiving a \$227,000 wire transfer from Victim L into BOA x7760, **CHO** purchased flights from Massachusetts to Texas for himself and Individual 3 using a debit card associated with BOA x7760. On or about June 16, 2017, **CHO** and Individual 3 withdrew a total of \$202,200 from BOA x7760, comprised of a \$8,000 cash withdrawal, a \$9,200 cash withdrawal, a cashier's check in the amount of \$90,000 made out to Business 4, and a second cashier's check in the amount of \$95,000 made out to Business 4, all from Bank of America branches located in Texas.

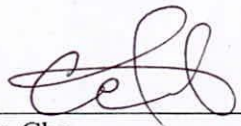
In total, the intended loss to Victims C, D, L, and M caused by **CHO** and his co-conspirators was \$3,310,670.

A substantial part of the fraudulent scheme was committed from outside the United States, specifically South Africa.

* * *

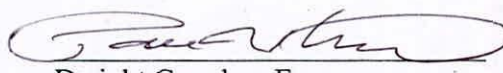
I have read this statement of facts and carefully reviewed it with my attorney. I acknowledge that it is true and correct.

8/6/18
Date


Carlson Cho

I am Carlson Cho's attorney. I have carefully reviewed the statement of facts with him.

8/6/18
Date


Dwight Crawley, Esq.

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In total, the intended loss to Victims C, D, L, and M caused by **CHO** and his co-conspirators was \$3,310,670.

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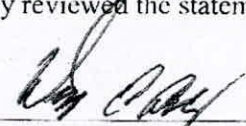
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Dwight Crawley, Esq.